

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION**

UNITED STATES OF AMERICA * CRIMINAL NO. 22-CR-00290-01
VERSUS * DISTRICT JUDGE JOSEPH
KANEILOUS JAQUAN WALKER * MAGISTRATE JUDGE MCCLUSKY

Motion to Suppress

Exhibit C

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
MONROE DIVISION

UNITED STATES OF AMERICA

CRIMINAL NO. 3:22-cr-209-01

VERSUS

JUDGE JOSEPH

KANEILOUS JAQUAN WALKER

MAGISTRATE JUDGE McCLUSKEY

DECLARATION

I, Matthew Morris, declare under penalty of perjury that the following is true to the best of my knowledge:

1. I am over the age of 18 and competent to make this declaration.
2. I have reviewed discovery produced by the United States in the above-captioned case. The discovery included body-worn camera footage labeled “Serenity Brown” and “Hunter Reddick.”
3. The discovery also included a report written by “Cpl. S. Smith.”
4. After comparing the report written by “Cpl. S. Smith” and the body-worn camera footage from “Serenity Brown,” it appears that Serenity Brown and Cpl. S. Smith are the same person.
5. At approximately 21:23:20 on the body-worn camera of Hunter Reddick, a person who appears to be Officer Anthony Cowan says: “Hey, I said ‘get out.’ Soon as he got out, whoever was driving, hopped in the front. And I was looking. That’s when I got on the radio and said ‘where you at? Come get this Charger.’”

6. At approximately 21:27:46 on the body-worn camera of Serenity Brown, a person who appears to be Officer Anthony Cowan says: "As soon as we pulled up, I seen whoever was in this car ... Dylan pulled right in front of him. The only thing I seen is this dude moving fast as hell, jump from the back seat to the front seat. And that's when I'm like, "Come get this damn Charger. This motherfucker is trying to go."

7. At approximately 21:34:10 on the body-worn camera of Serenity Brown, a person who appears to be Officer Anthony Cowan says: "he was sitting on the back seat."

8. At approximately 21:34:18 on the body-worn camera of Serenity Brown, a person who appears to be Officer Anthony Cowan says: "So what you do. Make sure you ... I'm going to tell you what happened. So, when we pulled up, he seen us. He immediately jumped from the back seat of the car to the front seat. I seen him do that."

9. At approximately 21:35:51 on the body-worn camera of Serenity Brown, a person who appears to be Officer Anthony Cowan says: "Hey, so. The way you can write it. This exactly what happened. Me and Dylan were up here doing some loitering complaints. As soon as we pulled up we observed him, the driver of that vehicle, get from the back seat of the car to the front seat of the car and drive off as soon as we pulled up. You tried to make contact with him, you lit him up, he pulled into here, and that's when he took off."

10. This image was taken from the body-worn camera of Serenity Brown:



Thus done and signed this 20th day of February, 2023.



Matthew Morris